

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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AMERICAN REINSURANCE COMPANY,  
et al.,

Plaintiffs,

v.

AMERICAN INTERNATIONAL GROUP  
and TRENWICK AMERICA  
REINSURANCE CORPORATION,  
Defendants.

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CIVIL ACTION NO: 05-11840-MLW

**ASSENTED TO MOTION TO FILE UNDER SEAL  
DEFENDANT TRENWICK AMERICA REINSURANCE CORPORATION'S  
MEMORANDUM IN OPPOSITION TO PLAINTIFFS' MOTION TO REMAND AND  
REPLY IN FURTHER SUPPORT OF TRENWICK'S MOTION TO STAY**

Defendant Trenwick America Reinsurance Corporation ("Trenwick") hereby moves to  
file under seal the following pleading:

- **TRENWICK AMERICA REINSURANCE CORPORATION'S  
MEMORANDUM IN OPPOSITION TO PLAINTIFFS' MOTION TO  
REMAND AND REPLY IN FURTHER SUPPORT OF TRENWICK'S  
MOTION TO STAY.**

Trenwick respectfully requests permission to file this pleading under seal because it  
references material submitted in connection with a confidential arbitration between Plaintiffs and  
co-defendant, American International Group ("AIG"). In accordance with the Local Rules,  
Trenwick respectfully request that this pleading be impounded until the final resolution of this  
litigation between the parties, at which time it will be retrieved by counsel for Trenwick.

WHEREFORE, it is respectfully requested that the Court grant this assented-to motion to  
file the above-described document under seal.

**Certification Pursuant to Local Rule 7.1**

Trenwick's counsel certifies that pursuant to Local Rule 7.1, counsel for Trenwick and the Plaintiffs have conferred regarding the issue presented by this motion, and Plaintiffs' counsel assented to this motion.

**TRENWICK AMERICA  
REINSURANCE CORPORATION**

By its attorneys,

/s/ Eben A. Krim  
Mark W. Batten BBO #566211  
Eben A. Krim BBO #652506  
**PROSKAUER ROSE LLP**  
One International Place, 22nd floor  
Boston, MA 02210  
(617) 526-9624

Of Counsel:  
Ronald S. Rauchberg  
Margaret A. Dale  
David L. Shaul  
PROSKAUER ROSE LLP  
1585 Broadway  
New York, New York 10036  
(212) 969-3000

Dated: November 15, 2005

**CERTIFICATE OF SERVICE**

I, Eben A. Krim, counsel for Defendant Trenwick America Reinsurance Corporation, hereby certify that on November 15, 2005, I served a copy of the foregoing document by overnight delivery on all known counsel of record.

/s/Eben A. Krim  
Eben A. Krim